

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MINNEAPOLIS FIREFIGHTERS' RELIEF  
ASSOCIATION, on behalf of itself and all others  
similarly situated,

Plaintiff,

v.

BRISTOL-MYERS SQUIBB COMPANY,  
PETER R. DOLAN, and ANDREW R.J.  
BONFIELD,

Defendants.

JEAN LAI, individually and on behalf of all others  
similarly situated,

Plaintiff,

v.

BRISTOL-MYERS SQUIBB COMPANY,  
PETER R. DOLAN, and ANDREW R.J.  
BONFIELD,

Defendants.

**ELECTRONICALLY FILED**

CIVIL ACTION No. 07cv5867 (PAC)

CIVIL ACTION No. 07cv6259 (PAC)

**DECLARATION OF JEFFREY P. CAMPISI IN SUPPORT OF THE MOTION OF THE  
MINNEAPOLIS FIREFIGHTERS' RELIEF ASSOCIATION FOR  
(1) CONSOLIDATION; (2) APPOINTMENT AS LEAD PLAINTIFF; AND  
(3) APPROVAL OF LEAD PLAINTIFF'S CHOICE OF CO-LEAD COUNSEL**

I, JEFFREY P. CAMPISI, declare the following under the penalty of perjury:

1. I am associated with the law firm of Kaplan Fox & Kilsheimer LLP and am admitted to practice before this Court. I respectfully submit this Declaration in Support of the motion of the Minneapolis Firefighters' Relief Association ("MFRA") for: (1) consolidation; (2) appointment as Lead Plaintiff; and (3) approval of Lead Plaintiff's choice of Co-Lead Counsel.

2. Attached hereto are true copies of the following documents:

- A. Exhibit A, Chart setting forth estimated losses of MFRA in the securities of Bristol-Myers Squibb Company;
- B. Exhibit B, June 27, 2007, Notice of Pendency of Class Action Lawsuit against Bristol-Myers Squibb Company, *et al.* for violation of certain provisions of the federal securities laws; and
- C. Exhibit C, Firm resume of Kaplan Fox & Kilsheimer LLP; and
- D. Exhibit D, Firm resume of Lockridge Grindal Nauen P.L.L.P.

Dated: August 27, 2007

s/ Jeffrey P. Campisi

JEFFREY P. CAMPISI

**EXHIBIT A**



**EXHIBIT B**

Yahoo! My Yahoo! Mail

Search: 

Web Search

[Sign In](#)  
New User? [Sign Up](#)[Finance Home](#) - [Help](#)[Welcome](#) [\[Sign In\]](#)To track stocks & more, [Register](#)

## Financial News

Enter symbol(s)  Basic  Symbol Lookup[Press Release](#)

Source: Kaplan Fox &amp; Kilsheimer LLP

### Kaplan Fox Seeks to Recover Losses for Investors Who Purchased Securities of Bristol-Myers Squibb Company

Wednesday June 27, 5:27 pm ET

NEW YORK, NY--(MARKET WIRE)--Jun 27, 2007 -- On June 20, 2007, Kaplan Fox & Kilsheimer LLP filed a class action lawsuit in the United States District Court for the Southern District of New York on behalf of a class (the "Class") of all persons who purchased securities of Bristol-Myers Squibb Company ("BMY" or the "Company") (NYSE:[BMY](#) - [News](#)) between March 22, 2006 and August 8, 2006, inclusive (the "Class Period") and alleges violations of the federal securities laws by BMY and certain of its present and/or former executives.

As alleged in the Complaint, on March 22, 2006, BMY announced that it, along with Sanofi-Aventis SA, entered into a settlement agreement with Apotex, Inc. ("Apotex") to resolve a patent infringement lawsuit ("Apotex Settlement") related to the drug Plavix. The Complaint further alleges that throughout the Class Period, BMY failed to disclose material facts regarding the Apotex Settlement including: (1) that BMY had relinquished material rights in connection with the settlement, including the right to treble damages; (2) that if the Apotex Settlement was not approved, Apotex could flood the market with its generic version of Plavix; and (3) that BMY had negotiated improper side agreements in connection with the Apotex Settlement.

On July 27, 2006, BMY revealed that the Antitrust Division of the United States Department of Justice ("DOJ") was conducting a criminal investigation into the Apotex Settlement and, as alleged, as a result of this disclosure, the price of BMY's securities declined \$1.95 per share, or 7.5%, to close at \$24.04 per share. On August 8, 2006, BMY disclosed additional material facts regarding the Apotex Settlement. As a result of this disclosure, it is alleged that BMY's securities declined \$1.56 per share, or approximately 7%, to close at \$21.21 per share.

The Complaint also alleges that on May 10, 2007 BMY issued a press release disclosing that the Company agreed to plead guilty to federal charges of making false statements to a government agency in connection with the Apotex Settlement.

If you are a member of the proposed Class, you may move the court no later than August 27, 2007 to serve as a lead plaintiff for the Class. You need not seek to become a lead plaintiff in order to share in any possible recovery.

Plaintiff seeks to recover damages on behalf of the Class and is represented by Kaplan Fox & Kilsheimer LLP. Our firm, with offices in New York, San Francisco, Los Angeles, Chicago and New Jersey, has many years of experience in prosecuting investor class actions and actions involving financial fraud. For more information about Kaplan Fox & Kilsheimer LLP, or to review a copy of the complaint filed in this action, you may visit our website at [www.kaplanfox.com](http://www.kaplanfox.com).

If you have any questions about this Notice, the action, your rights or your interests, please e-mail us at [mail@kaplanfox.com](mailto:mail@kaplanfox.com) or contact:

*Contact:*

Contacts:

Frederic S. Fox  
Joel B. Strauss

Jeffrey P. Campisi  
KAPLAN FOX & KILSHEIMER LLP  
805 Third Avenue, 22nd Floor  
New York, NY 10022  
(800) 290-1952  
(212) 687-1980  
Fax: (212) 687-7714  
E-mail address: [Email Contact](#)

Laurence D. King  
KAPLAN FOX & KILSHEIMER LLP  
555 Montgomery Street, Suite 1501  
San Francisco, CA 94111  
(415) 772-4700  
Fax: (415) 772-4707  
E-mail address: [Email Contact](#)

---

Source: Kaplan Fox & Kilsheimer LLP

---

Copyright © 2007 Yahoo! Inc. All rights reserved. [Privacy Policy](#) - [Terms of Service](#) - [Copyright Policy](#) - [Ad Feedback](#)

Copyright © 2007 Marketwire. All rights reserved. All the news releases provided by Marketwire are copyrighted. Any forms of copying other than an individual user's personal reference without express written permission is prohibited. Further distribution of these materials is strictly forbidden, including but not limited to, posting, emailing, faxing, archiving in a public database, redistributing via a computer network or in a printed form.

**EXHIBIT C**



Kaplan Fox & Kilsheimer LLP  
 805 Third Avenue, 22<sup>nd</sup> Floor  
 New York, New York 10022  
 phone 212.687.1980  
 fax 212.687.7714  
 email mail@kaplanfox.com  
 www.kaplanfox.com

**KAPLAN FOX & KILSHEIMER LLP**  
**FIRM AND ATTORNEYS BIOGRAPHIES**

Kaplan Fox & Kilsheimer LLP is a firm engaged in the general practice of law with an emphasis on complex securities, antitrust and consumer class action litigation as well as other general commercial litigation. The firm has actively participated in numerous complex class actions throughout the country for the past three decades. It is presently active in major litigations pending in federal and state courts throughout the country including courts in California, New York, Massachusetts, Delaware, Florida, Illinois, Indiana and Georgia.

Members of the firm have served as lead or co-lead counsel, as executive committee member or as liaison counsel, and made significant contributions in many complex class and other multi-party actions in which substantial recoveries were obtained, including the following:

**SECURITIES:**

**In re 3Com Securities Litigation**

C-97-21083-EAI (N.D.Ca) (\$259 million recovered)

**In re MicroStrategy Securities Litigation**

CV-00-473-A (E.D.Va) (\$155 million recovered)

**In re Informix Securities Litigation**

C-97-129-CRB (N.D.Ca) (\$136.5 million recovered)

**In re Elan Corporation Securities Litigation**

02-CV-0865-RMB (S.D.N.Y.) (\$75 million recovered)

**In re Xcel Energy, Inc. Securities Litigation,**

Master File No. 02-CV-2677-DSD (D.Mn) (\$80 million recovered)

**In re L.A. Gear Securities Litigations**

CV-90-2832-KN(Bx); CV-91-0400-KN(Bx); CV-91-4039-MRP(Jrx)  
 (C.D.Ca.) (\$50 million plus recovered)

NEW YORK, NY

LOS ANGELES, CA

SAN FRANCISCO, CA

CHICAGO, IL

RICHMOND, VA

MORRISTOWN, NJ

**Rosen, et al. v. Macromedia, Inc., et al.**  
No. 988526 (Sup. Ct. Ca.) (\$48 million recovered)

**In re Ames Department Stores Securities Litigation**  
MDL No. 924 (S.D.N.Y.) (\$46 million recovered)

**In re Genentech, Inc. Securities Litigation**  
C-88-4038-DLJ (N.D.Ca.) (\$29 million recovered)

**In re Tele-Communications, Inc. Securities Litigation**  
C-97-421(C.D.Ca.) (\$26.5 million recovered)

**In re Sun Healthcare Group, Inc. Litigation**  
C-95-7005-JC/WWD (D.N.M.) (\$24 million recovered)

**In re PepsiCo Securities Litigation**  
82 Civ. 8288 (S.D.N.Y.) (\$21 million recovered)

**In re Centennial Technologies Litigation**  
97-10304-REK (D. Mass.) (\$21.5 million recovered and other consideration)

**Kensington Capital Management v. Oakley, Inc., et. al.**  
SACV97-808 GLT (Ex) (C.D.Ca) (\$17.5 million recovered)

**In re Computer Memories Securities Litigation**  
C-85-2335 (A)-EFL (N.D.Ca.) (\$15.5 million recovered)

**Scheatzle, et al. v. Eubanks, et al.**  
C-92-20785-JW(EAI) (N.D.Ca.) (\$18.6 million recovered)

**In re Computer Memories Securities Litigation,**  
C-85-2335 (A)-EFL (N.D.Ca.) (\$15.5 million recovered)

**In re Wyse Technology Securities Litigation,**  
C-89-1818-WHO (N.D.Ca.) (\$15.5 million recovered)

**Provenz v. Miller, et al.**  
C-92-20159-RMW (N.D.Ca.) (\$15 million recovered)

**In re Gupta Corporation Securities Litigation**  
C-94-1517-FMS (N.D.Ca.) (\$14.25 million recovered)

**In re MicroPro Securities Litigation**  
C-85-7428-EFL (N.D.Ca.) (\$14 million recovered)

**In re Immunex Securities Litigation**  
C-92-48 WD (W.D.Wa.) (\$14 million recovered)

**Barry Hallet, Jr. v. Li & Fung, Ltd., et al.**

95 Civ. 8917 (S.D.N.Y.) (\$13.65 million recovered)

**Stuart Markus v. The North Face, Inc., et al.**

No. 97-Z-473 (D.Co) (\$12.5 million recovered)

**In re Salomon Analyst Williams Litigation**

C-02-8156-GEL (S.D.N.Y.) (\$12.5 million recovered)

**Mel Klein v. Laura L. King, et al.**

C-88-3141-FMS (N.D.Ca.) (\$11.65 million recovered)

**Igor Cheredrichenko, et al. v. Quarterdeck Corp., et al.**

Case No. 97-4320 (GHK) (C.D. Ca.) (\$11 million recovered)

**In re Cheyenne Software, Inc. Securities Litigation**

94 Civ. 2771 (E.D.N.Y.) (\$10.25 million recovered)

## ATTORNEY BIOGRAPHIES

### PARTNERS

**ROBERT N. KAPLAN** Widely recognized as a leading securities litigator, Robert Kaplan has led the prosecution of numerous securities fraud class actions and shareholder derivative actions, recovering hundreds of millions of dollars for the victims of corporate wrongdoing. He also has earned a reputation as a leading litigator in the antitrust and consumer protection arenas. Mr. Kaplan has been with Kaplan Fox for 30 years, joining in 1971.

Mr. Kaplan honed his litigation skills as a trial attorney with the U.S. Department of Justice. There, he gained significant experience litigating both civil and criminal actions. He also served as law clerk to the Hon. Sylvester J. Ryan, then chief judge of the U.S. District Court for the Southern District of New York.

Mr. Kaplan's published articles include: "Complaint and Discovery In Securities Cases," *Trial*, April 1987; "Franchise Statutes and Rules," *Westchester Bar Topics*, Winter 1983; "Roots Under Attack: *Alexander v. Haley* and *Courlander v. Haley*," *Communications and the Law*, July 1979; and "Israeli Antitrust Policy and Practice," *Record of the Association of the Bar*, May 1971.

In addition, Mr. Kaplan served as an acting judge of the City Court for the City of Rye, N.Y. from 1990 to 1993.

Mr. Kaplan sits on the boards of several community organizations, including the Board of Directors of the Carver Center in Port Chester, N.Y. and the Board of Directors of the Rye Free Reading Room in Rye, N.Y.

**Education:**

- B.A., Williams College (1961)
- J.D., Columbia University Law School (1964)

**Bar affiliations and court admissions:**

- Bar of the State of New York (1964)
- U.S. Supreme Court
- U.S. Courts of Appeals for the Second, Third, Seventh, Ninth, and Eleventh Circuits
- U.S. District Courts for the Southern, Eastern, and Northern Districts of New York, the Central District of Illinois, and the District of Arizona

**Professional affiliations:**

- National Association of Securities and Commercial Law Attorneys (past President)
- Committee to Support the Antitrust Laws (past President)
- Advisory Group of the U.S. District Court for the Eastern District of New York
- American Bar Association
- Association of Trial Lawyers of America (Chairman, Commercial Litigation Section, 1985-86)
- Association of the Bar of the City of New York (served on the Trade Regulation Committee; Committee on Federal Courts)

*Mr. Kaplan can be reached by email at [RKaplan@kaplanfox.com](mailto:RKaplan@kaplanfox.com).*

**FREDERIC S. FOX** Fred Fox first associated with Kaplan Fox in 1984, and became a partner in the firm in 1991. He has concentrated his work in the area of securities fraud litigation. Mr. Fox has played important roles in many major securities fraud cases. He was one of the lead trial lawyers in two recent securities class actions, one of which was the first case tried to verdict under the Private Securities Litigation Reform Act of 1995.

Mr. Fox is the author of "Current Issues and Strategies in Discovery in Securities Litigation," ATLA, 1989 Reference Material; "Securities Litigation: Updates and Strategies," ATLA, 1990 Reference Material; and "Contributory Trademark Infringement: The Legal Standard after *Inwood Laboratories, Inc. v. Ives Laboratories*," University of Bridgeport Law Review, Vol. 4, No. 2.

During law school, Mr. Fox was the notes and comments editor of the University of Bridgeport Law Review.

**Education:**

- B.A., Queens College (1981)
- J.D., Bridgeport School of Law (1984)

**Bar affiliations and court admissions:**

- Bar of the State of New York (1985)
- U.S. Courts of Appeals for the Fourth, Fifth, and Sixth Circuits
- U.S. District Courts for the Southern and Eastern Districts of New York
- U.S. Court of Appeals for the Second Circuit

**Professional affiliations:**

- American Bar Association
- Association of the Bar of the City of New York
- Association of Trial Lawyers of America (Chairman, Commercial Law Section, 1991-92)

*Mr. Fox can be reached by email at FFox@kaplanfox.com.*

**RICHARD J. KILSHEIMER** first associated with Kaplan Fox in 1976, and became a partner in the firm in 1983. His practice is concentrated in the area of antitrust litigation, and he has played significant roles in several of the largest antitrust class actions in the country. He also practices in the areas of securities fraud and commercial litigation.

Prior to joining the firm, Mr. Kilsheimer served as law clerk to the Hon. Lloyd F. MacMahon (1975-76), formerly Chief Judge of the U.S. District Court for the Southern District of New York.

Mr. Kilsheimer is co-author of "Secondary Liability Developments," ABA Litigation Section, Subcommittee on Secondary Liability, 1991-1994.

**Education:**

- A.B., University of Notre Dame (1972)
- J.D., cum laude, St. John's University (1975)

**Bar affiliations and court admissions:**

- State of New York (1976)
- U.S. Court of Appeals for the Second Circuit (1983)
- U.S. District Courts for the Southern and Eastern Districts of New York (1976) and the Northern District of Indiana (1987)

**Professional affiliations:**

- Association of the Bar of the City of New York
- Federal Bar Council
- Committee to Support the Antitrust Laws
- Association of Trial Lawyers of America

*Mr. Kilsheimer can be reached by email at RKilsheimer@kaplanfox.com.*

**GREGORY K. ARENSEN** is a seasoned business litigator with experience representing clients in a variety of areas, including antitrust, securities, employee termination, fraud, contract, and unfair competition. His economics background provides unique insights on antitrust liability and damages issues. Mr. Arenson has been a partner in the firm since 1993.

Prior to joining Kaplan Fox, Mr. Arenson was a partner with Proskauer Rose. Earlier in his career, he was a partner with Schwartz Klink & Schreiber, and an associate with Rudnick & Wolfe (now Piper Marbury).

Mr. Arenson writes frequently on discovery issues and the use of experts. Recently published articles include: "Who Should Bear the Burden of Producing Electronic Information?" 7 *Federal Discovery News*, No. 5, at 3 (April 2001); "Work Product vs. Expert Disclosure – No One Wins," 6 *Federal Discovery News*, No. 9, at 3 (August 2000); "Practice Tip: Reviewing Deposition Transcripts," 6 *Federal Discovery News*, No. 5, at 13 (April 2000); and "The Civil Procedure Rules: No More Fishing Expeditions," 5 *Federal Discovery News*, No. 9, at 3 (August 1999). He was also co-author of "The Good, the Bad and the Unnecessary: Comments on the Proposed Changes to the Federal Civil Discovery Rules," 4 *NYLitigator* 30 (December 1998); co-author of "The Search for Reliable Expertise: Comments on Proposed Amendments to the Federal Rules of Evidence," 4 *NYLitigator* 24 (December 1998); co-editor of *Federal Rules of Civil Procedure, 1993 Amendments, A Practical Guide*, published by the New York State Bar Association; and a co-author of "Report on the Application of Statutes of Limitation in Federal Litigation," 53 *Albany Law Review* 3 (1988).

Mr. Arenson's *pro bono* activities include service as a mediator in the U.S. District Court for the Southern District of New York. In addition, he is an active alumnus of the Massachusetts Institute of Technology, serving as a member of the Corporation, a member of the Corporation Development Committee, vice president of the Association of Alumni/ae, and member of the Alumni/ae Fund Board (of which he was a past chair).

**Education:**

- S.B., Massachusetts Institute of Technology (1971)
- J.D., University of Chicago (1975)

**Bar affiliations and court admissions:**

- Bar of the State of Illinois (1975)
- Bar of the State of New York (1978)
- U.S. Supreme Court
- U.S. Courts of Appeals for the Second and Seventh Circuits
- U.S. District Courts for the Northern and Central Districts of Illinois, and the Southern and Eastern Districts of New York
- U.S. Tax Court

**Professional affiliations:**

- New York State Bar Association, Federal Litigation Section, Committee on Federal Procedure (Chairman since 1997)
- Association of the Bar of the City of New York
- American Bar Association
- Member, advisory board, Federal Discovery News (1999 – present)

*Mr. Arenson can be reached by email at [GArenson@kaplanfox.com](mailto:GArenson@kaplanfox.com).*

**LAURENCE D. KING** Larry King first associated with Kaplan Fox in 1994, and became a partner in the firm in 1998. Mr. King, who practices in the areas of securities and consumer litigation, is a resident partner in the firm's San Francisco office. Mr. King has played a substantial role in cases that have resulted in some of the largest recoveries obtained by Kaplan Fox and was one of the lead trial lawyers in two recent securities class actions, one of which was the first case tried to verdict under the Private Securities Litigation Reform Act of 1995.

Prior to joining Kaplan Fox, Mr. King honed his litigation skills as an assistant district attorney for New York County, where he tried numerous felony prosecutions to a jury verdict.

**Education:**

- B.S., Wharton School of the University of Pennsylvania (1985)
- J.D., Fordham University School of Law (1988)

**Bar affiliations and court admissions:**

- Bar of the State of Connecticut (1988)
- Bar of the State of New York (1989)
- Bar of the State of New Jersey (1993)
- Bar of the Commonwealth of Pennsylvania (1993)
- Bar of the State of California (2000)
- U.S. District Courts for the District of New Jersey, the Eastern District of Pennsylvania, the Southern and Eastern Districts of New York, and the Central District of California

**Professional affiliations:**

- New York State Bar Association
- New Jersey State Bar Association
- San Francisco Bar Association
- American Bar Association

*Mr. King can be reached by email at [LKing@kaplanfox.com](mailto:LKing@kaplanfox.com).*

**JOEL B. STRAUSS** first associated with Kaplan Fox in 1992, and became a partner in the firm in 1999. He practices in the area of securities and consumer fraud class action litigation, with a special emphasis on accounting and auditing issues.

Prior to joining Kaplan Fox, Mr. Strauss served as a senior auditor with one of the former “Big Eight” accounting firms. Combining his accounting background and legal skills, he has played a critical role in successfully prosecuting numerous securities class actions across the country on behalf of shareholders. Mr. Strauss was one of the lead trial lawyers for the plaintiffs in the first case to go to trial and verdict under the Private Securities Litigation Reform Act of 1995.

Although currently practicing exclusively in the area of law, Mr. Strauss is a licensed Certified Public Accountant in the State of New York.

Mr. Strauss has also been a guest lecturer on the topics of securities litigation, auditors’ liability and class actions for seminars sponsored by the Practicing Law Institute and the National Consumer Law Center.

**Education:**

- B.A., Yeshiva University (1986)
- J.D., Benjamin N. Cardozo School of Law (1992)

**Bar affiliations and court admissions:**

- Bar of the State of New Jersey
- Bar of the State of New York
- U.S. District Courts for the Southern and Eastern Districts of New York and the District of New Jersey
- U.S. Court of Appeals for the Third Circuit

**Professional affiliations:**

- American Bar Association (member, Litigation Section, Rule 23 Subcommittee)
- Association of the Bar of the City of New York
- New York State Bar Association
- American Institute of Certified Public Accountants

*Mr. Strauss can be reached by email at [JStrauss@kaplanfox.com](mailto:JStrauss@kaplanfox.com).*

**LINDA P. NUSSBAUM** joined Kaplan Fox in February 2007 as a partner. She previously was the resident Partner of the New York City office of Cohen Milstein Hausfeld & Toll P.L.L.C. from 2001 until joining Kaplan Fox.

She is presently in a leadership position in a number of significant antitrust class actions pending throughout the United States including: In re Plastics Additives Antitrust Litigation (E.D. Pa); In re DDAVP Litigation (S.D.N.Y); In re Aciphex Litigation: (S.D.N.Y); In re: Ovcon Litigation;(D.D.C.), and In re Plavix Litigation;(S.D.Oh.).

She has recently served as a lead counsel in a number of antitrust class actions that have resolved favorably for the plaintiff class including In re Lorazepam and Clorazepate Antitrust Litigation (D.D.C.), where, in approving the \$35 million settlement, Chief Judge Hogan commented,

“Obviously, the skill of the attorneys, and I’m not going to spend the time reviewing it, I’m familiar with counsel, and they, as I said, are among the best antitrust litigators in the country;” In re Relafen Antitrust Squibb Co. (D. Mass); and Oncology Radiation Associates, P.A. v. Bristol Myers Squibb Co. (D.D.C.) (\$65 million settlement).

Ms. Nusbaum is a member of the American Law Institute. She has lectured at the ABA Antitrust section Spring Meeting on several occasions and will lecture again this year, and at The University of San Francisco Pharmaceutical Antitrust Seminar.

Ms. Nussbaum received her undergraduate degree in Sociology and Journalism, magna cum laude, from Brooklyn College of the City University of New York in 1974, where she was a member of Phi Beta Kappa. She has received her law degree from the National Law Center at George Washington University, where she graduated with honors in 1977. She received an LL.M. degree in Taxation from the New York University School of Law in 1984.

Ms. Nussbaum is admitted to practice in New York and the District of Columbia.

**Education:**

- B.A., Brooklyn College (1974)
- J.D., George Washington University (1977)
- LL.M., Degree in Taxation from New York University School of Law (1984)

**Bar Affiliations and Court Admissions:**

- Bar of the State of New York (1974)
- U. S. District Courts for the Southern, Eastern and Northern Districts of New York, and the District of Columbia

**Professional Affiliations:**

- American Bar Association
- New York State Bar Association

*Ms. Nussbaum can be reached by email at [LNussbaum@kaplanfox.com](mailto:LNussbaum@kaplanfox.com).*

**HAE SUNG NAM** first associated with Kaplan Fox in 1999, and became a partner in the firm in 2005. She practices in the areas of securities and antitrust litigation.

Prior to joining the firm, Ms. Nam was an associate with Kronish Lieb Weiner & Hellman LLP, where she trained in corporate securities law and mergers and acquisitions. She also served as an intern for the U.S. Department of Justice, Antitrust Division.

During law school, Ms. Nam was a member of the George Washington University Law Review. She is the author of a case note, “Radio – Inconsistent Application Rule,” 64 Geo. Wash. L. Rev. (1996).

**Education:**

- B.A., magna cum laude, Syracuse University (1994)
- J.D., with honors, George Washington University School of Law (1997)

**Bar affiliations and court admissions:**

- Bar of the State of New York (1998)
- U.S. District Court for the Eastern District of Wisconsin

**Professional affiliations:**

- New York State Bar Association
- American Bar Association

*Ms. Nam can be reached by email at HNam@kaplanfox.com.*

**DONALD R. HALL** first associated with Kaplan Fox in 1998, and became a partner in the firm in 2005. He practices in the areas of antitrust, securities, and civil litigation.

During law school, Mr. Hall was a member of the Fordham Urban Law Journal and a member of the Fordham Moot Court Board. He also participated in the Criminal Defense Clinic, representing criminal defendants in federal and New York State courts on a pro-bono basis.

**Education:**

- B.A., College of William and Mary (1995)
- J.D., Fordham University School of Law (1998)

**Bar affiliations and court admissions:**

- Bar of the State of Connecticut (2001)
- Bar of the State of New York (2001)
- U.S. District Court for the Southern District of New York
- U.S Court of Appeals for the Second Circuit

**Professional affiliations:**

- American Bar Association
- Association of Trial Lawyers of America
- New York State Bar Association

*Mr. Hall can be reached by email at DHall@kaplanfox.com.*

**JASON A. ZWEIG** joined Kaplan Fox in January of 2003 and became a partner in the firm in 2007. He practices in the areas of securities, antitrust, and other areas of civil litigation.

Prior to joining the firm, Mr. Zweig was an associate with Proskauer Rose LLP in New York where he practiced in all areas of civil and criminal litigation.

During law school, Mr. Zweig was Executive Editor for the Columbia Journal of Environmental Law.

**Education:**

- B.S., Indiana University (1995)
- J.D., Columbia University School of Law (1998)

**Bar affiliations and court admissions:**

- Bar of the State of New York (1999)

- U.S. Dist. Court for the Southern District of New York (2000)
- U.S. Dist. Court for the Eastern District of New York (2000)
- United States Court of Appeals for the Third Circuit (2001)
- United States Court of Appeals for the Second Circuit (2006)

**Professional affiliations:**

- Association of the Bar of the City of New York
- American Bar Association
- New York State Bar Association
- Association of Trial Lawyers of America

*Mr. Zweig can be reached by email at [JZweig@kaplanfox.com](mailto:JZweig@kaplanfox.com).*

## ASSOCIATES

**CHRISTINE FOX** has been associated with Kaplan Fox since 1995. She practices in the areas of securities and antitrust litigation.

**Education:**

- B.S., Cornell University (1992)
- J.D., University of Michigan Law School (1994)

**Bar affiliations and court admissions:**

- Bar of the State of New York (1995)
- U.S. District Courts for the Southern and Eastern Districts of New York

**Professional affiliations:**

- American Bar Association
- New York State Bar Association
- New York County Lawyers Association
- Bar Association of the City of New York

*Ms. Fox can be reached by email at [CFox@kaplanfox.com](mailto:CFox@kaplanfox.com).*

**LORI S. BRODY** became associated with Kaplan Fox in 2001 and is resident in the firm's Los Angeles office. She practices in the area of complex litigation.

**Education:**

- B.A., University of California, Berkeley (1987)
- J.D., University of California, Los Angeles (1990)

**Bar affiliations and court admissions:**

- Bar of the State of California (1990)
- U.S. District Courts for the Northern, Central and Southern Districts of California

*Ms. Brody can be reached by email at [LBrody@kaplanfox.com](mailto:LBrody@kaplanfox.com).*

**JEFFREY P. CAMPISI** became associated with Kaplan Fox in February 2004. He practices in the areas of securities, antitrust, and other areas of civil litigation.

Prior to joining the firm, Mr. Campisi served as law clerk to the Hon. Herbert J. Hutton. Also, Mr. Campisi was an associate with Dewey Ballantine LLP in New York where he practiced in all areas of civil litigation.

During law school, Mr. Campisi was a member of the Villanova Law Review.

**Education:**

- B.A., cum laude, Georgetown University (1996)
- J.D., summa cum laude, Villanova University School of Law (2000)

**Bar affiliations and court admissions:**

- Bar of the State of New York (2001)

- U.S. Dist. Court for the Southern District of New York (2001)
- U.S. Dist. Court for the Eastern District of New York (2001)

**Professional affiliations:**

- American Bar Association

*Mr. Campisi can be reached by email at [JCampisi@kaplanfox.com](mailto:JCampisi@kaplanfox.com).*

**LOUIS A. KESSLER** joined the firm's San Francisco office in 2005. Mr. Kessler focuses his practice on Antitrust, Securities Fraud and Consumer Fraud class actions. Prior to joining the firm, Mr. Kessler was an associate at Much Shelist Freed Denenberg Ament & Rubenstein PC in Chicago, Illinois. He also has worked for the Enforcement Division of the United States Securities and Exchange Commission and for Equal Rights Advocates, a public interest law firm, in San Francisco.

**Education:**

- B.A., Physics and Philosophy, Amherst College (1997)
- J.D., The Law School, The University of Chicago (2002)

**Bar affiliations and court admissions:**

- Bar of the State of Illinois (2002)
- United States District Court for the Northern District of Illinois (2002)
- United States District Court for the Eastern District of Wisconsin (2003)
- Bar of the State of California (2006)

**Professional affiliations:**

- American Bar Association
- Chicago Bar Association

*Mr. Kessler can be reached by email at [LKessler@kaplanfox.com](mailto:LKessler@kaplanfox.com).*

**WHITNEY E. STREET** became associated with Kaplan Fox in May 2006. She practices in the areas of securities, antitrust, and other areas of civil litigation. During law school, Ms. Street was a member of the Virginia Journal of Social Policy and the Law and the Virginia Journal of Law and Technology and provided pro bono legal services to the Charlottesville community through the Legal Aid Justice Center.

Prior to joining the firm, Ms. Street was an associate with Pillsbury Winthrop Shaw Pittman LLP in San Francisco where she practiced in all areas of civil litigation.

**Education:**

- B.A., University of Virginia (1999)
- J.D., University of Virginia School of Law (2002)

**Bar Affiliations:**

- Bar of the State of California (2002)
- Bar of the State of Texas (2004)

*Ms. Street can be reached by email at [WStreet@kaplanfox.com](mailto:WStreet@kaplanfox.com)*

**MELINDA RODON** has been associated with Kaplan Fox since September 2004. She practices in the areas of securities, antitrust, and other areas of civil litigation.

While attending law school, Ms. Rodon provided pro bono legal services to the Philadelphia community through the Civil Practice Clinic of the University of Pennsylvania Law School as well as the Homeless Advocacy Project. She also conducted pro bono legal research for the Southern Poverty Law Center.

**Education:**

- B.A., cum laude, University of Missouri (2000)
- J.D., University of Pennsylvania Law School (2004)

**Bar Affiliations and Court Admissions:**

- Bar of the State of New York, (2005)
- U.S. District Courts for the Southern and Eastern Districts of New York

*Ms. Rodon can be reached by email at: MRodon@kaplanfox.com.*

**AVIAH COHEN PIERSON** has been associated with Kaplan Fox since September 2005. She practices in the areas of antitrust, securities, and other areas of civil litigation.

During law school, Ms. Pierson interned for Judge Mark D. Fox in the Southern District of New York. In addition, she was a member of the Fordham Law Review.

**Education:**

- B.A., summa cum laude, University of Pennsylvania (2000)
- J.D., Fordham University School of Law (2005)

**Bar Affiliations and Court Admissions:**

- Bar of the State of New York (2006)
- U.S. District Courts for the Southern and Eastern Districts of New York

*Ms. Cohen Pierson can be reached by e-mail at: ACohenpierson@kaplanfox.com*

## OF COUNSEL

**MARY G. MORRIS** practices in the area of securities litigation. She associated with the firm in 2002. Prior to joining Kaplan Fox, Ms. Morris served as Treasurer of Virginia and before that served as Virginia's Senior Assistant Attorney General for Finance and Tax, responsible for all the Commonwealth's tax litigation.

**Education:**

- B.A., with distinction, Christopher Newport College of the College of William and Mary (1976)
- J.D., Marshall-Wythe School of Law, College of William and Mary (1981)
- M.L.& T., Marshall-Wythe School of Law, College of William and Mary (1982)

**Bar affiliations and court admissions:**

- Bar of the State of Virginia (1981)
- U.S. Supreme Court
- U.S. Court of Appeals for the Fourth Circuit
- U.S. District Courts for the Eastern and Western Districts of Virginia

**Professional affiliations:**

- Virginia State Bar Association
- Virginia Women Attorneys Association
- National Association of Bond Lawyers

*Ms. Morris can be reached by email at: [MMorris@kaplanfox.com](mailto:MMorris@kaplanfox.com).*

**W. MARK MCNAIR** practices in the area of securities litigation with a special emphasis on institutional investor involvement. He associated with the firm in 2003, and is resident in Washington, D.C. Prior to entering private practice, he was an attorney at the Securities and Exchange Commission and the Municipal Securities Rulemaking Board.

**Education:**

- B.A. with honors, University of Texas at Austin (1972)
- J.D. University of Texas at Austin (1975)
- L.L.M. (Securities) Georgetown University (1989)

*Mr. McNair can be reached at [MMcnair@kaplanfox.com](mailto:MMcnair@kaplanfox.com)*

**LINDA M. FONG** practices in the areas of general business and consumer protection class action litigation. She has been associated with Kaplan Fox since 2001, and is resident in the firm's San Francisco office. Ms. Fong serves on the Board of the San Francisco Trial Lawyers Association and is active in its Women's Caucus.

**Education:**

- J.D., University of San Francisco School of Law (1985)
- B.S., with honors, University of California, Davis

- Elementary Teaching Credential, University of California, Berkeley

**Bar affiliations and court admissions:**

- Bar of the State of California (1986)
- U.S. District Courts for the Northern and Eastern Districts of California
- U.S. Court of Appeals for the Ninth Circuit

**Professional affiliations:**

- San Francisco Trial Lawyers Association
- Asian American Bar Association
- Bar Association of San Francisco
- Trial Lawyers for Public Justice
- Consumer Attorneys of California

**Awards:**

- Presidential Award of Merit
- Consumer Attorneys of California, 2000

*Ms. Fong can be reached by email at: LFong@kaplanfox.com*

**GARY L. SPECKS** practices primarily in the area of complex antitrust litigation. He has represented plaintiffs and class representatives at all levels of litigation, including appeals to the U.S. Courts of Appeals and the U.S. Supreme Court. In addition, Mr. Specks has represented clients in complex federal securities litigation, fraud litigation, civil RICO litigation, and a variety of commercial litigation matters. Mr. Specks is resident in the firm's Chicago office.

During 1983, Mr. Specks served as special assistant attorney general on antitrust matters to Hon. Neil F. Hartigan, then Attorney General of the State of Illinois.

**Education:**

- B.A., Northwestern University (1972)
- J.D., DePaul University College of Law (1975)

**Bar affiliations and court admissions:**

- Bar of the State of Illinois (1975)
- U.S. Courts of Appeals for the Third, Fifth, Seventh, Ninth and Tenth Circuits
- U.S. District Court for the Northern District of Illinois, including Trial Bar

**Professional affiliations:**

- American Bar Association
- Illinois Bar Association
- Chicago Bar Association

*Mr. Specks can be reached by email at: GSpecks@kaplanfox.com*

**WILLIAM J. PINILIS** practices in the areas of commercial, consumer and securities class action litigation. He has been associated with Kaplan Fox since 1999, and is resident in the firm's New Jersey office.

In addition to his work at the firm, Mr. Pinilis has served as an adjunct professor at Seton Hall School of Law since 1995, and is a lecturer for the New Jersey Institute for Continuing Legal Education. He has lectured on consumer fraud litigation and regularly teaches the mandatory continuing legal education course Civil Trial Preparation.

Mr. Pinilis is the author of "Work-Product Privilege Doctrine Clarified," *New Jersey Lawyer*, Aug. 2, 1999; "Consumer Fraud Act Permits Private Enforcement," *New Jersey Law Journal*, Aug. 23, 1993; "Lawyer-Politicians Should Be Sanctioned for Jeering Judges," *New Jersey Law Journal*, July 1, 1996; "No Complaint, No Memo – No Whistle-Blower Suit," *New Jersey Law Journal*, Sept. 16, 1996; and "The *Lampf* Decision: An appropriate Period of Limitations?" *New Jersey Trial Lawyer*, May 1992.

**Education:**

- B.A., Hobart College (1989)
- J.D., Benjamin Cardozo School of Law (1992)

**Bar affiliations and court admissions:**

- Bar of the State of New Jersey (1992)
- Bar of the State of New York (1993)
- U.S. District Courts for the District of New Jersey, and the Southern and Eastern Districts of New York

**Professional affiliations:**

- Morris County Bar Association
- New Jersey Bar Association
- Graduate, Brennan Inn of Court

Mr. Pinilis can be reached by email at [WPinilis@kaplanfox.com](mailto:WPinilis@kaplanfox.com)

**CHARLES J. MOXLEY, JR.** Charles Moxley practices in the areas of securities, insurance, commercial, corporate, and general civil litigation, as well as performing arbitration and appellate work. He has been associated with Kaplan Fox since 1994.

Mr. Moxley started his career as an associate at Davis Polk & Wardwell, and thereafter was a member of several New York City law firms. He has also served as a law professor at St. John's University School of Law and as an adjunct professor at New York Law School, teaching courses in the litigation area, including federal and New York practice, evidence, and professional responsibility. Mr. Moxley has been an arbitrator on numerous substantial arbitrations before the American Arbitration Association in the securities, contract, intellectual property, employment, construction, and other areas. He has also served extensively as a special master in New York Supreme Court.

He is the author of *International Law and Nuclear Weapons in the Post Cold War World* (Austin & Winfield, 2000) (with forewords by Robert S. McNamara, David W. Leebron, and Kosta Tsipis).

Mr. Moxley's pro bono activities include service as Chair of the Independent Judicial Screening Committee for the designation of candidates for New York City Civil Judge. He is also a member of the board of the Lawyers' Committee for Nuclear Policy and a former board member of the Lawyers Alliance for World Security. In addition, he has served as New York City Law Industry Chair for the March of Dimes Walkathon.

During law school, Mr. Moxley served as managing editor of the Columbia Journal of Transnational Law. He then served as law clerk to the Hon. Thomas F. Croake of the U.S. District Court for the Southern District of New York.

**Education:**

- B.A., Fordham University (1965)
- M.A., Fordham University (1966)
- J.D., Columbia University School of Law (1969)

**Bar affiliations and court admissions:**

- Bar of the State of New York (1969)
- U.S. Supreme Court
- U.S. Courts of Appeals for the Second and Seventh Circuits
- U.S. District Courts for the Southern and Eastern Districts of New York

**Professional affiliations:**

- American Bar Association
- Association of the Bar of the City of New York
- New York State Bar Association
- New York County Lawyers Association

*Mr. Moxley can be reached by email at CMoxley@kaplanfox.com*

**SUSAN R. SCHWAIGER** Susan Schwaiger joined Kaplan Fox in February 2007. She practices in the area of antitrust law. Prior to joining the firm, Ms. Schwaiger was Of Counsel with Cohen, Milstein, Hausfeld & Toll, P.L.L.C. and Pomerantz, Haudek Block Grossman & Gross LLP, practicing in the antitrust area, and an associate with Shearman & Sterling, where she practiced in all areas of litigation. During law school, Ms. Schwaiger was a member of the Brooklyn Law Review.

**Education:**

- B.S., University of Tennessee (1971)
- M.A., University of Kentucky (1973)
- J.D., Brooklyn Law School (1992)

**Bar Affiliations and Court Admissions:**

- Bar of the State of New York (1993)
- U.S. District Courts for the Southern, Eastern and Northern Districts of New York (1993)

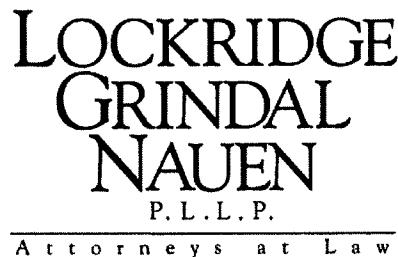
**Professional Affiliations:**

- American Bar Association
- New York State Bar Association

*Ms. Schwaiger can be reached by email at Sschwaiger@kaplanfox.com*

As of 03/20/07

**EXHIBIT D**



Founded in 1978, Lockridge Grindal Nauen P.L.L.P. has extensive experience in antitrust, securities, environmental, employment, health care, commercial, intellectual property and telecommunications law.

Our clients include agri-businesses, business enterprises, banks, local governments, trade and industry associations, real estate developers, telecommunications providers, health care professionals, casualty insurers, publishers and authors, union and public pension funds, and a major computer manufacturer and retailer.

Lockridge Grindal Nauen P.L.L.P. attorneys are assisted by more than 20 paralegals and government relations specialists, and an extensive support staff. The firm has offices in Minneapolis, Minnesota and Washington, D.C.

### **Securities Litigation**

Lockridge Grindal Nauen is well known and highly regarded for its aggressive, fast-paced securities litigation practice. Our comprehensive, in-depth knowledge of the federal securities laws and more than 25 years of experience in complex securities litigation ensures that our clients' interests are zealously protected and vigorously pursued.

Notable cases the firm has litigated include:

- In re: Piper Funds, Inc. Institutional Government Income Portfolio Litigation and Richard Rodney, et al. v. KPMG, LLP, two cases venued in the United States District Court for the District of Minnesota, Lockridge Grindal Nauen served as Co-Lead Counsel and recovered over \$80 million for a class of persons and institutions who purchased shares in the Piper Jaffray Institutional Government Income Portfolio.
- In re: Worldcom Securities Litigation (S.D.N.Y.) was a securities class action which resulted in settlements totaling over \$6 billion, the second largest recovery ever in a

securities class action. The firm was one of only five firms specifically picked by Lead Counsel and the New York State Common Fund (Lead Plaintiff) and approved by the court to assist with the prosecution of the case on behalf of the shareholders and bondholders.

- In re Retek Inc. Securities Litigation is a securities class action lawsuit currently being prosecuted in United States District Court in the District of Minnesota. The case was filed in 2002 and the Louisiana Municipal Police Employees' Retirement System is the Lead Plaintiff and has been certified as Class Representative. LGN is serving as liaison counsel to the class. Discovery is proceeding in the case
- In re Telxon Corp. Securities Litigation and Haymann v. PricewaterhouseCoopers LLP, venued in the Northern District of Ohio, resulted in over \$67 million being recovered and distributed to the class of purchasers of Telxon Corp. stock.
- In In re OM Group, Inc. Securities Litigation, also venued in the Northern District of Ohio, over \$92 million was recovered from the OM Group defendants and Ernst & Young LLP and distributed to purchasers of OM Group stock.
- In re: Select Comfort Corporation Securities Litigation, serving as Co-Lead Counsel, the firm recovered \$5.75 million for shareholders in this class action venued in the District of Minnesota.

## Attorneys

### Richard A. Lockridge

Richard A. Lockridge is a partner in Lockridge Grindal Nauen P.L.L.P. He is a graduate of the University of Iowa Law School (J.D., with high distinction, 1974) where he served as Managing Editor of the Iowa Law Review. Thereafter, from 1974 to 1976, he served as a law clerk to the Honorable Myron H. Bright of the United States Court of Appeals for the Eighth Circuit. From 1976 to 1978 he handled civil litigation as a Minnesota Special Assistant Attorney

General.

During more than twenty five years of practice, Mr. Lockridge has been continuously active in class action and other complex litigation, including the following: lead or co-lead counsel in:

- In re Air Cargo Shipping Services Antitrust Litigation, 1:06-md-1775-CBA-VVP (E.D.N.Y.);
- In re Select Comfort Corporation Securities Litigation, Master File No. 99-884 (D. Minn.);
- In re Baycol Products Litigation, MDL No. 1431 (D. Minn.);
- In Re Microcrystalline Cellulose Antitrust Litigation, MDL 1402 (E.D. Pa.);
- In re Monosodium Glutamate Antitrust Litigation, MDL No. 1328 (D. Minn.);
- In Re Lutheran Brotherhood Variable Insurance Products Co. Sales Practices Litigation, MDL No. 1309 (D. Minn.);
- Gary Meyers v. The Guardian Life Insurance Company of America, Inc. Litigation, Civil No. 2:97CV35-D-B (N.D. Miss.);
- Alan B. Spitz and Linda Spitz, and Ann Novacheck v. Connecticut General Life Insurance Company, MDL No. 1136 (C.D. Cal.);
- In re Summit Medical Systems, Inc. Securities Litigation, Master File No. 97-558 (D. Minn.);
- In re Digi International Inc. Securities Litigation, Master File No. 97-5 (D. Minn.);
- In re Catfish Antitrust Litigation, MDL No. 928 (N.D. Miss.);
- Benacquisto, et al. v. American Express Financial Corp. et al., Master File No. 00-1980 (D. Minn.), Civil Action No. 96-18477 (Hennepin County District Court Minn.) (insurance class action);
- Gary G. Smith, et al. v. Little Caesar Enterprises, Inc., et al. (Little Caesar Franchise Litigation), Civil No. 93 CV 74041 DT (E.D. Mich.);
- In re Piper Funds, Inc. Institutional Government Income Portfolio Litigation, Master File No. 3-94-587 (D. Minn.);
- In re Residential Doors Antitrust Litigation, MDL No. 1039 (E.D. Pa.);

- In re Carpet Antitrust Litigation, MDL No. 1075 (N.D. GA);
- In re LaserMaster Technologies, Inc. Securities Litigation, Master File No. 4-95-631 (D. Minn.);
- Richard J. Rodney, Jr., et al. v. KPMG Peat Marwick, 4-95-CIV-800 (D. Minn.);
- In re Citi-Equity Group, Inc. Securities Litigation, Master File No. 3-94-1024 (D. Minn.);
- Lockwood Motors, Inc., et al. v. General Motors Corporation, Master File No. 3-94-1141 (D. Minn);
- David L. Antonson, et al. v. Leon H. Robertson, et al. (American Carriers Securities Litigation) Civ. No. 88-2567 (D. Kan.);
- In re Steel Drums Antitrust Litigation, MDL No. 887 (S.D. Ohio);
- In re New Steel Pails Antitrust Litigation, Master File No. C-1-91-213 (S.D. Ohio);
- In re Unisys Savings Plan Litigation, Master File No. 91-3067 (E.D. Pa.); and
- George Guenther, et al. v. Cooper Life Sciences, et al. (Cooper Life Sciences Securities Litigation), C 89-1823 MHP (N.D. Cal.).

Mr. Lockridge also is or has been involved in the following litigation:

- Funeral Consumers Alliance, Inc., et al. v. Service Corporation International, et al., No. H-05-3394 (S.D. Tex.);
- In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL 1720 (E.D.N.Y.);
- In re Worldcom, Inc. Securities Litigation No. 02-CV-3288 (S.D.N.Y.);
- In re Credit Suisse – AOL Securities Litigation, Case No. 1:02-CV-12146-NG (D. Mass.);
- Haritos, et al. v. American Express Financial Advisors, Inc., 02-2255-PHX-PGR (D. Ariz.);
- In re King Pharmaceuticals, Inc. Securities Litigation, No. 2:03-CV-77 (E.D. Tenn.);
- In re Delphi Corporation Securities, ERISA, and Shareholder Derivative Litigation, Master Case No. 05-md-1725 (E.D. Mich.);
- In re Merck & Co., Inc., Securities, Derivative & ERISA Litigation, 3:05cv-1151 (D.N.J.);

- In re AOL Time Warner Securities Litigation, MDL No. 1500 (S.D.N.Y.);
- In re Vioxx Product Liability Litigation, MDL No. 1657 (E.D.La.);
- In re Scientific-Atlanta, Inc. Securities Litigation, No. 1:01-CV-1950 (N.D. Ga.);
- In re OM Group, Inc. Securities Litigation, No. 1:02 CV 2163 (N.D. Ohio);
- Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al., MDL No. 1584 (S.D.N.Y.) (Federal Home Loan Mortgage Corporation Securities Litigation);
- In re Federal National Mortgage Association Securities, Derivative and ERISA Litigation, MDL No. 1668 (D. D.C.);
- Rodney v. OCA, Inc., et al., No. 05-2219 (E.D. La.);
- In re Telxon Securities Litigation, No. 5:98-CV-2876 (N.D. Ohio);
- In re Retek, Inc. Securities Litigation, Master File No. 02-4209 (D. Minn.);
- Aviva Partners, LLC, v. Navarre Corp., et al., Master File No. 05-1151 (D. Minn.);
- In re Chronimed Inc., Securities Litigation, Master File No. 01-1092 (D. Minn.);
- Glen Lewy 1990 Trust v. Investment Advisers, Inc., et al., No. CT-00-17047 (Henn. Cty. Dist. Ct.);
- Fink v. Rainforest Café, No. MC 00-451 (Henn. Cty. Dist. Ct.);
- Crosby v. Aid Association for Lutherans, Master File No. 00-CV-2112 (D. Minn.);
- In re Rezulin Litigation, MDL 1348 (S.D. N.Y.);
- In re Serzone Productions Liability Litigation, MDL No. 1477 (S.D.W.V.);
- In re Tamoxifen Citrate Antitrust Litigation, MDL No. 1408 (E.D. N.Y.);
- In re Western Union Money Transfer Litigation, Master File No. CV 01 0335 (E.D.N.Y.);
- In re Meridia Products Liability Litigation, MDL No. 1481 (N. D. Ohio);
- In Re Propulsid Products Liability Litigation, MDL No. 1355 (E.D. LA);
- In re Methionine Antitrust Litigation, MDL No. 1311 (N.D. Cal.);
- In re Flat Glass Antitrust Litigation, MDL No. 1200 (W.D. PA);
- Chemical Distribution, Inc., et al. v. Akzo Nobel Chemicals, et al., MDL No. 1226 (N.D. Cal.);

- Durocher v. American Family Life Insurance Co., Case No. 97-CV-292 (Marinette Co. Dist.);
- Marksman Partners, L.P., et al. v. Chantal Pharmaceutical Corporation, et al., Master File No. CV-96-0872-WJR (C.D. Cal.);
- In re Connecticut General Life Insurance Co. Premium Litigation, MDL No. 1336 (C.D. Cal.);
- In re Lease Oil Antitrust Litigation, MDL No. 1166 (S.D. Tex.);
- In re Tricord Systems, Inc. Securities Litigation, Master File No. 3-94-746(D. Minn.);
- In re Riscorp, Inc. Securities Litigation, Master File No. CV-96-2374-CIV-T-23A (M.D. Fla.);
- In re Nasdaq Market-Maker Antitrust Litigation, MDL No. 1023 (S.D.N.Y.);
- John S. Lawrence v. Philip Morris Companies, Inc., et al. (Philip Morris Securities Litigation), Civ. No. 94-1494 (E.D.N.Y.);
- Leetate Smith, et al. v. Merrill Lynch & Co., et al. (Orange County Bond Litigation), No. SACV-94-1063-LHM(EEx) (C.D. Cal.);
- Nelsen v. Craig-Hallum (Craig-Hallum Securities Litigation), Master File No. 4-86-135 (D. Minn.);
- Johnson v. Kives (K-Tel Securities Litigation), Master File No. 4-85-1216 (D. Minn.);
- In re Endotronics Securities Litigation, Master File No. 4-87-130 (D. Minn.);
- In re Wirebound Box Antitrust Litigation, MDL No. 793 (D. Minn.);
- American Telephone and Telegraph Antitrust Litigation, Civil Action No. 81-2623 (D.D.C.);
- In re Domestic Air Transportation Antitrust Litigation, MDL No. 861 (N.D. Ga.);
- In re Painewebber Securities Litigation, 86 Civ. 6776 (S.D.N.Y.);
- In re ICN/Viratek Securities Litigation, 87 Civ. 4296 (S.D.N.Y.);
- In re Bioplasty Securities Litigation, Master File No. 4-91-689 (D. Minn.);
- Low Density Polyethylene Resin Antitrust Litigation, No. 82 Civ. 1093 (S.D.N.Y.);
- Dixie Brewing Company, Inc. v. John Barth, Inc. (In re Hops Antitrust Litigation), Civ. No. 8404434 (E.D. Pa.);

- Steven S. Mitchell v. Thousand Trails, Inc. (Thousand Trails Security Litigation), Civ. No. C86-146 (W.D. Wash.); and
- Spencer v. Comserv Corporation (Comserv Securities Litigation), Master File No. 4-84-794 (D. Minn.).

Mr. Lockridge acted as co-lead defense counsel for the target defendant in Mid-State Oil v. Simonson Oil (price fixing) Civil No. A3-79-18 (D.N.D.); plaintiff's counsel in Superlines Co. v. E.W. Wylie Corp., 1981-2 Trade Cases (CCH) (D. Minn. 1981); and one of the defense counsel in Ray Adduono v. World Hockey Association, Master File No. 3-82-586 (D. Minn.).

Mr. Lockridge spent one year in Houston, Texas trying the Corrugated Container Antitrust Litigation, MDL No. 310 (S.D. Tex), a case which resulted in one of the largest verdicts (in excess of \$1 billion) ever awarded by a jury in antitrust litigation. He was also part of the plaintiffs' trial team for In re High Pressure Laminates Antitrust Litigation, MDL No. 1368 (S.D.N.Y.), a case in which settlements totaled over \$40 million.

Mr. Lockridge also was one of the attorneys who successfully represented West Publishing Company in a monopolization and attempted monopolization case brought by West against Mead Corporation (the then owner of "LEXIS"), and in a monopolization and attempted monopolization case brought by Mead against West (the "LEXIS v. Westlaw" antitrust cases).

### **Karen Hanson Riebel**

Karen Hanson Riebel is a partner in Lockridge Grindal Nauen P.L.L.P. A 1991 dual-degree program graduate (J.D., B.A., Cum Laude) from the Boston University School of Law and the Boston University College of Liberal Arts, Ms. Riebel joined the firm in 1992.

During her tenure at the firm, she has litigated a number of complex class action matters including:

- Funeral Consumers Alliance, Inc., et al. v. Service Corporation International, et al., No. H-05-3394 (S.D. Tex.);
- In re Air Cargo Shipping Services Antitrust Litigation, 1:06-md-1775-CBA-VVP (E.D.N.Y.);
- In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation, MDL 1720 (E.D.N.Y.);
- In re Credit Suisse – AOL Securities Litigation, Case No. 1:02-CV-12146-NG (D. Mass.);
- In re Worldcom, Inc. Securities Litigation No. 02-CV-3288 (S.D.N.Y.);
- In re AOL Time Warner Securities Litigation, MDL No. 1500 (S.D.N.Y.);
- In re King Pharmaceuticals, Inc. Securities Litigation, No. 2:03-CV-77 (E.D. Tenn.);
- In re Delphi Corporation Securities, ERISA, and Shareholder Derivative Litigation, Master Case No. 05-md-1725 (E.D. Mich.);
- In re Merck & Co., Inc., Securities, Derivative & ERISA Litigation, 3:05cv-1151 (D.N.J.);
- In re Federal National Mortgage Association Securities, Derivative and ERISA Litigation, MDL No. 1668 (D. D.C.);
- In re Scientific-Atlanta, Inc. Securities Litigation, No. 1:01-CV-1950 (N.D. Ga.);
- In re OM Group, Inc. Securities Litigation, No. 1:02 CV 2163 (N.D. Ohio);
- Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al., MDL No. 1584 (S.D.N.Y.) (Federal Home Loan Mortgage Corporation Securities Litigation);
- In re Select Comfort Corporation Securities Litigation, Master File No. 99-884 (D.

Minn.);

- In Re Lutheran Brotherhood Variable Insurance Products Co. Sales Practices Litigation, MDL No. 1309 (D. Minn.);
- Rodney v. OCA, Inc., et al., No. 05-2219 (E.D. La.);
- Danis v. USN Communications, Inc., et al., No. 98 C 7482 (N.D. Ill.);
- In re Digi International Inc. Securities Litigation, Master File No. 97-5 (D. Minn.);
- In re Summit Medical Systems, Inc. Securities Litigation, Master File No. 97-558 (D. Minn.);
- In re LaserMaster Technologies, Inc. Securities Litigation, Master File No. 4-95-631 (D. Minn.);
- In re Ancor Communications, Inc. Securities Litigation, Master File No. 97-1696 (D. Minn.);
- In re Cerdian Corp. Securities Litigation, Master File No. 97-2044 (D. Minn.);
- In re K-Tel Securities Litigation, Master File No. 98-2520 (D. Minn.);
- In re Riscorp, Inc. Securities Litigation, Master File No. CV-96-2374-CIV-T-23A (M.D. Fla.);
- In re Lease Oil Antitrust Litigation, MDL No. 1166 (S.D. Tex.);
- In re Wirebound Box Antitrust Litigation, MDL No. 793 (D. Minn.);
- David L. Antonson, et al. v. Leon H. Robertson, et al. (American Carriers Securities Litigation), Civ. No. 88-2567 (D. Kan.);
- In re Tonka II Securities Litigation, Civ. No. 3-90-318 (D. Minn.);
- In re Catfish Antitrust Litigation, MDL No. 928 (D. Miss.);
- In re ICN/Viratek Securities Litigation, 87 Civ. 4296 (S.D.N.Y.);
- Joseph D. Chutich v. Green Tree Acceptance, Inc., Master File No. 3-88-869 (D. Minn.); and
- Richard J. Rodney, Jr., et al. v. KPMG Peat Marwick, Master File No. 4-95-800 (D. Minn.).

During the summer of 1996, Ms. Riebel spent three months in New York as a member of the team of lawyers that tried the In re ICN/Viratek Securities Litigation in the Southern District

of New York before the Honorable Kimba Wood. The case was settled for \$14.5 million after the jury returned a partial verdict.

Ms. Riebel spent seven months in Anchorage, Alaska, in 1994, as a member of the trial team that secured a jury verdict for punitive damages in the amount of \$5 billion for a mandatory punitive damages class in In re The Exxon Valdez, Case No. A89-0095-CV (D. Alaska). For their efforts, Ms. Riebel and the other members of the trial team were awarded the Trial Lawyers' For Public Justice Trial Lawyers of the Year award in 1994. In addition, Ms. Riebel was extensively involved in the administration and evaluation of the more than 50,000 claims submitted in that litigation.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 27, 2007, I caused to be electronically filed the foregoing paper with the Clerk of the Court using the ECF System which will electronically send notification of such filing to the registered participants and paper copies will be sent via first-class mail postage pre-paid to those indicated as non-registered participants on August 27, 2007.

/s/ Jeffrey P. Campisi  
Jeffrey P. Campisi

August 27, 2007

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 27, 2007, I caused to be electronically filed the foregoing paper with the Clerk of the Court using the ECF System which will electronically send notification of such filing to the registered participants and paper copies will be sent via first-class mail postage pre-paid to those indicated as non-registered participants on August 27, 2007.

/s/ Jeffrey P. Campisi  
Jeffrey P. Campisi

August 27, 2007